

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

RUTH SMITH, individually and on behalf of all others similarly situated,

Plaintiff,

v.

SUNPATH, LTD., a Massachusetts corporation,

Defendant.

Case No. 1:22-cv-00081-LMB-WEF

PLAINTIFF'S DEPOSITION DESIGNATION

Plaintiff Ruth Smith (“Plaintiff”), by and through her counsel, designates the following portions of the deposition of Chukran Management Group, LLC d/b/a American Protection:

Witness	Page Designations (Page:Lines)
Kobi Chukran, Rule 30(b)(6) designee for American Protection	5:11-14; 8:10-25; 9:1-19; 11:11-18; 18:22-25; 19:1-14; 20:1-25; 21:1-3; 24:5-18, 19-25; 25:1-9, 12-20; 26:1-25; 27:1-25; 29:9-25; 30:1-16; 31:1-25; 32:1-25; 33:1-16, 24-25; 34:1-25; 35:1-25; 36:1-25; 37:1-4, 16-25; 38:1-23; 39:15-25; 40:1-23; 41:10-25; 42:1-9, 25; 43:1-14, 24-25; 44:1-25; 45:10-25; 46:1-2, 15-25; 47:1-25; 48:1-2, 12-18; 49:4-7; 51:3-25; 52:1-2; 54:3-8; 56:1-4; 60:6-25; 61:1-25; 62:1-12, 13-25; 63:1-3; 70:13-25; 71:1-25; 72:1-2; 73:22-25; 74:1-12, 16-17; 76:19-25; 77:1-25; 78:1-22; 79:13-25; 80:1-25; 81:1-16; 82:9-25; 83:1-25; 84:1-3; 85:15-25; 86:1-25; 87:1-8, 10-25; 88:1-25; 89:1-13, 19-25; 90:1-25; 91:1-5; 92:11-25; 93:1-13; 95:9-25; 96:1-21; 97:9-13; 100:5-18, 25; 101:1-25; 106:4-25; 107:1-11; 135:17-25; 136:1-20; 138:5-25; 139:1, 18-25; 140:1-19; 141:1-25; 142:1-25; 143:1-22; 144:2-5; 145:16-25; 146:1-25; 147:1-25; 148:1-25; 149:1-25; 150:1-25; 151:1-5; 155:18-20; 156:1-18; 159:21-25; 160:1-25; 161:1-25; 162:1-25; 163:1-25; 164:1-25; 165:1-25; 166:1-25; 167:1-25; 168:1-25; 169:1-25; 170:1-25; 171:1-25; 172:1-8; 175:16-20; 177:2-25; 178:1; 180:7-25; 181:1-25; 182:1-6, 22-25; 183:1, 14-25; 184:1-25; 185:1-25; 186:1-25; 187:1-25; 189:1-25; 190:1-25; 191:1-25; 192:1-25; 193:1-13; 212:8-11; 215:3-14; 217:23-25; 218:1-8; 222:18-25; 223:1-8; 228:24-25; 229:1-20; 231:6-21; 237:18-25; 238:1-25; 239:1-17; 244:20-25; 245:1-25; 246:1-8; and Exhibits 1-20.

Smith reserves the right to amend this deposition designation based as the circumstances

of the case may require (including the addition of necessary demonstratives to aid in the trial of this matter).

Smith reserves the right to designated additional deposition excerpts to rebut any designated by Defendant.

Dated: December 14, 2022

RUTH SMITH, individually and on behalf of all others similarly situated,

By: /s/ Francis J. Driscoll, Jr.
One of Plaintiff's Attorneys

Francis J. Driscoll, Jr.
(frank@driscollawoffice.com)
4669 South Blvd., Suite 107
Virginia Beach, VA 23452
Telephone: 757-321-0054
Facsimile: 757-321-4020

Patrick H. Peluso
ppeluso@woodrowpeluso.com
Woodrow & Peluso, LLC
3900 East Mexico Ave., Suite 300
Denver, Colorado 80210
Telephone: (720) 213-0675
Facsimile: (303) 927-0809

Attorneys for Plaintiff and the Classes

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above titled document was served upon counsel of record by filing such papers via the Court's ECF system on December 14, 2022.

/s/ Francis J. Driscoll, Jr.